

Planning Statement

13-17 Kenelm Road,
Rhos-on-Sea



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1. Introduction

Purpose of Statement

- 1.1 This Planning Statement has been prepared to accompany a full planning application for the demolition of existing buildings and erection of a care home with access; parking; hard and soft landscaping and associated works at the former Priory Grange Nursing Home, 13-17 Kenelm Road, Rhos-on-Sea.
- 1.2 The purpose of this document is to assess the proposed development in the context of the adopted Development Plan in force for the area and other material considerations relevant to the determination of the application, including Planning Policy Wales (12th edition) and should be read in conjunction with the submitted planning drawings and technical information forming the planning application package.

Structure of Statement

- 1.3 This Planning Statement is structured as follows:
- **Section 2** analyses the context of the site.
 - **Section 3** describes the development proposals.
 - **Section 4** sets out the relevant planning policy context.
 - **Section 5** assesses the key planning issues and considerations relating to the proposals.
 - **Section 6** draws conclusions on the overall finding of the statement.

2. Site Context

2.1 The application site comprises of the former Priory Grange Nursing Home located on Kenelm Road towards the southern edge of the Rhos-on-Sea urban area.



Figure 2.1: Location Plan. NB: red line added to denote site.

2.2 The site lies equidistant between the centres of Rhos-on Sea (to the north) and Colwyn Bay (to the south). Colwyn Bay

accommodates a wide range of shops, services, community facilities and public transportation options. There are also bus stops within 300m of the site providing further opportunities for sustainable travel.



Figure 2.2: Site Photograph

2.3 It is understood that Priory Grange closed in August 2018, owing to viability issues and it has remained closed since. It previously employed 14 members of staff and accommodated 29 residents, across 28 bedrooms (one double room), eight of which had ensuite bathrooms. The site is currently occupied by the two-storey former care home buildings, which are finished in facing brickwork at ground floor level with pebble dashing

to the first floor. There is a car parking area to the front of the building that could accommodate approximately five vehicles accessed directly from Kenelm Road with a large garden area to the rear. The site currently has an unkempt appearance owing to its extended period of vacancy.

Planning History

- 2.4 Following the closure of the care home, two applications were submitted to the LPA for the demolition the care home and erection of 8no. dwellings (LPA Refs: 0/48201 and 0/48202) in March 2021. These applications were subsequently refused for the following reason:

“The application site is within an area which has a distinctive characteristic by virtue of its dominance by early twentieth century dwellings, which typically have a traditional appearance and which stand within spacious plots. The proposal would result in the demolition of a traditional building and the proposed town houses would have a modern appearance by virtue of their elevational treatment, scale and profile, which together with the loss of the stone boundary wall to the front, would be injurious to the prevailing character of the area and would be overdevelopment of the site. The application is therefore contrary to Planning Policy Wales (Edition 11), Technical Advice Note (Wales) 12: Design, Policies DP3, DP4 and DP6 of the adopted Conwy Local Development Plan.”

- 2.5 Further to the above, the site has also been subject to the following planning applications:

- **LPA ref: 0/32431** - Part demolition and erection of extension to nursing home.
Approved on 20/12/2006
- **LPA ref: 15620**** - Extension to provide link between 2 residential homes.
Approved on 16/02/1994
- **LPA ref: 13639**** - Extension to provide link between two residential homes.
Approved on 04/02/1991

- **LPA ref: 11522**** - Use as home for elderly mentally infirm (continued use of home without complying with conditions 1 & 2 of planning permission code ref. 1/cba/3029). Approved on 30/06/1988
- **LPA ref: 10005**** - Extension to rest home. Approved on 29/04/1986
- **LPA ref: 1/CBA/3693** - Erection of fire escape. Approved on 27/04/1979
- **LPA ref: 1/CBA/3029** - Use of premises as a home for the elderly, for not more than 12 persons. Approved on 31/08/1978
- **LPA ref: 1/cba/2640** - increase from 12 to 17 of number of residents in home for the elderly. historical (001 - approved) on 02/03/1978
- **LPA ref: 1/CBA/2373** - Extension to nursing home for the elderly to provide additional residential and private accommodation. Refused on 01/09/1977
- **LPA ref: 1/CBA/2088** - Use of guest house as home for the elderly. Approved on 31/03/1977
- **LPA ref: 1/ CBA /2515** - Extension to aged persons home to provide additional private and residential accommodation. Approved on 03/11/1977
- **LPA ref: 1/ CBA /2399** - Increase of elderly (*sic.*) residents in nursing home from 11 to 12. Approved on 02/09/1977
- **LPA ref: 1/ CBA /385** - Extension to dwelling. Approved on 23/08/1974

Pre-Application Discussions

- 2.6 A pre-application enquiry was submitted to the Conwy Council In December 2023 and the response received on 17th January 2024 (LPA ref: DC/ENQ/32581) confirmed that Officers were generally supportive of the proposals in principle, as follows:

'The development is acceptable in principle, subject to sustainability principles and impact on visual and residential amenity, biodiversity/nature conservation, landscaping, highway safety etc.'

3. Development Proposals

- 3.1 The development proposals relate to the demolition of the existing building and erection of a replacement, purpose-built residential care facility at 13-17 Kenelm Road, Rhos-on-Sea.
- 3.2 The current building has been closed since 2018 and is no longer fit for purpose. The proposals will therefore secure the comprehensive redevelopment of a longstanding vacant site in order to provide much needed care facilities in the community. The proposed care home will provide 50 No. ensuite bedrooms across three floors. The ground floor will accommodate en-suite bedrooms, as well as a reception, waiting area, office, kitchen, staff room and two amenity areas that will provide direct access to the rear garden areas. The first and second floors will accommodate further en-suite bedrooms, as well as associated staff and communal areas. A total of 9 No. car parking spaces will be provided to the front of the building and a landscaped private garden area will be provided to the rear, including outdoor terraces adjacent to the building.



Figure 3.1: Proposed Site Plan

- 3.3 The overall design of the building has been proposed in consideration of local surroundings and has been formulated using a materials palette which will assimilate well with nearby properties, including facing brickwork, grey powder coated aluminium windows and clay roof tiles. The proposed building will be 2.5 storey in height with the accommodation within the roofspace served by dormer windows.



Figure 3.2: Proposed Elevations

4. Planning Policy Context

Development Plan

4.1 The adopted Development Plan for the area comprises of the Conwy County Borough Council Local Development Plan (LDP), adopted October 2013.

4.2 The site lies within a Strategic Regeneration Area Employment Area (Policies DP/2, DP/7 and DP/8) as illustrated by the adjacent extract from the adopted Local Plan Policies Map.

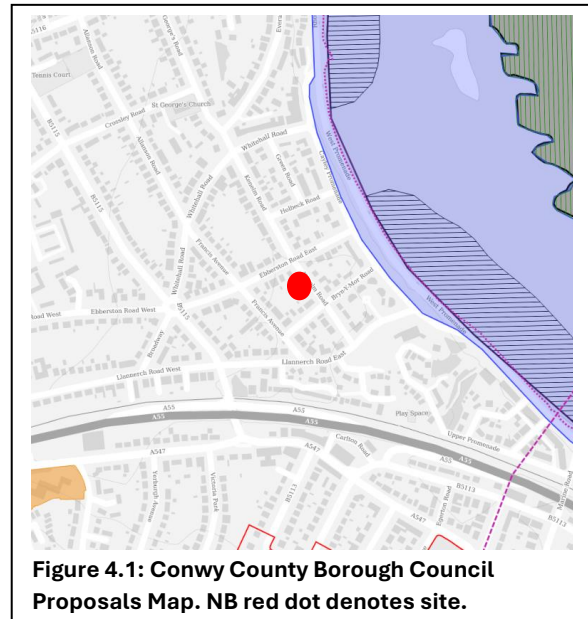


Figure 4.1: Conwy County Borough Council Proposals Map. NB red dot denotes site.

4.3 The proposals relate to the redevelopment of the site to deliver a new care home and the following policies of the adopted LDP are considered to be of relevance to the assessment of the application:

- Policy DP/1 – Sustainable Development Principles;
- Policy DP/2 – Overarching Strategic Approach);
- Policy DP/3 – Promoting Design Quality and Reducing Crime;
- Policy DP/4 – Development Criteria;
- Policy DP/5 – Infrastructure and New Developments;
- Policy DP/6 – National Planning Policy and Guidance;
- Policy DP/7 – Masterplans and Community Appraisals;
- Policy DP/8 – Colwyn Bay Urban Regeneration Masterplan;
- Policy HOU/11 – Residential Care Homes and Extra Care Housing;
- Policy NTE/3 – Biodiversity;
- Policy CTH/5 – The Welsh Language; and
- Policy STR/2 – Parking Standards.

Other Material Considerations

Planning Policy Wales

- 4.4 The revised 12th edition of Planning Policy Wales (PPW) was published in February 2024 and sets out the Government's planning policies for Wales and how they should be applied. It is supplemented by a series of Technical Advice Notes (TANs), Minerals Technical Advice Notes (MTANs), Welsh Government Circulars, and policy clarification letters, which together with PPW, provide the national planning policy framework for Wales which forms a material consideration in planning decisions.
- 4.5 The PPW confirms that the purpose of the planning system is to contribute to the delivery of sustainable development and improve the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty.
- 4.6 The concept of sustainable development is at the heart of the PPW but is also reinforced by the Well-being of Future Generations Act, which places a duty on public bodies to carry out sustainable development. The introduction of this Act has further expanded the concept of sustainable development, as it requires an improvement in the delivery of all four aspects of well-being, namely, social, economic, environmental and cultural.
- 4.7 Paragraph 1.18 of the PPW confirms that a plan-led approach is the most effective way to secure sustainable development through the planning system and that it is essential that plans are adopted and kept under review. Furthermore, said legislation reflects a presumption in favour of sustainable development in order to ensure that social, economic, cultural and environmental issues are balanced and integrated.
- 4.8 Paragraph 1.21 of the PPW reiterates that planning applications must be determined in accordance with the adopted plan, unless material considerations indicate otherwise.

- 4.9 Paragraph 1.30 of the PPW confirms that development management relates to the positive and proactive approach to shaping, considering, determining and delivering development proposals through the process of deciding planning applications. It is led by the planning authority, working collaboratively with those proposing developments and other stakeholders including the local community. It must be undertaken in the spirit of partnership and inclusiveness and support the delivery of key priorities and outcomes (contributing to improving the social, economic, environmental and cultural well-being).

5. Planning Assessment

5.1 Having regard to the adopted Development Plan in force for the area and other material considerations, the key planning considerations in the assessment of the current application proposals are as follows:

- Principle of Development;
- Design / Impact on Character and Appearance of the Area;
- Residential Amenity;
- Highways / Access;
- Ecology;
- Trees;
- Flood Risk / Drainage

Principle of Development

5.2 The proposals involve the redevelopment of the former Priory Grange Care Home to provide a new purpose-built 50-bed care home.

5.3 The site is located within the development boundary of Rhos-on-Sea, which is defined as an urban area by Conwy Local Development Plan Policy DP/2. The PPW further recognises the importance of meeting the differing housing needs of the communities, including older people and people with disabilities.

5.4 The site has an established use as a 29-bedroom care home and the current proposals are seeking the comprehensive redevelopment of the site to deliver a modern format residential care home providing a total of 50-bedrooms. The proposals therefore represent a modest uplift in the existing number of bedrooms and will deliver a high quality residential care facility within a highly accessible location in the main urban area to meet the housing needs of an ageing population through the redevelopment of previously developed land in line with well-established policy objectives.

- 5.5 The proposals are therefore considered to represent an appropriate form of development in this location in principle, as acknowledged by Officers at pre-application stage.

Design / Impact on Character and Appearance of the Area

- 5.6 Local Plan Policy DP3 requires all new development to be of high quality, sustainable design which protects an area's local character and distinctiveness. Furthermore, the Council will require development to be appropriate to, and enhance, its locality in terms of form, scale, massing, elevation detail and use of materials.
- 5.7 The prevailing character of the surrounding area is large, detached and semi-detached dwellings, mostly dating from the early 20th Century, although there is a degree of variation in terms of building style, roof design, height and the palette of finishing materials in the immediate locality.
- 5.8 The current proposals involve the erection of a 2.5 storey residential care building, with dormer windows to serve the bedrooms within the roofspace and the overall scale and height of the building is broadly commensurate with the existing buildings on site and surrounding built form. Moreover, whilst the accommodation will be provided within a single building, there will be setbacks within the front façade to break up the overall bulk and massing of the building giving the impression that it is three separate buildings, similar to the existing arrangement on site and to ensure the character of the existing area is respected.
- 5.9 The proposals also incorporate design features seen elsewhere within the immediate locality, such as bay windows, as well as the setbacks within the front façade to ensure that the proposed development respects the prevailing character of the local area and this design approach was largely welcomed within the pre-application advice received.
- 5.10 Moreover, an appropriate material palette has been proposed which is reflective of the surrounding context with the buildings predominantly finished in facing brickwork with clay roof tiles. The design and proportions of the window openings is reflective of the surrounding built form with artstone heads and cills incorporated.

- 5.11 The application proposals therefore represent a high quality form of development that will be well assimilated into the wider streetscene and can therefore be seen to accord with Policy DP/3 of the adopted Conwy LDP.

Residential Amenity

- 5.12 Local Development Plan Policy DP/4 states that planning permission will not be granted where the proposed development would have an unacceptable adverse impact on residential amenity. Paragraph 3.21 of the PPW reinforces that the planning system must consider the impacts of new development on existing communities and maximise health protection and well-being and safeguard amenity.
- 5.13 The application site is located within a well-established residential area and is bounded by residential properties along Kenelm Road itself, as well as Francis Road to the rear, and Bryn Y Mor Road and Ebberston Road to either side. The proposals involve the demolition of the existing care home building and the erection of a new 2.5 storey care home, which will broadly respect the established building line to the west of Kenelm Road with appropriate levels of separation maintained between the principal elevation of the proposed building and the existing residential properties on the opposite side of Kenelm Road.
- 5.14 The proposals seek to provide single and two-storey offshoots to the rear of the main body of the proposed building, which will provide communal amenity areas to the ground floor and bedspaces at first floor level. The submitted Proposed Site Plan clearly demonstrates that sufficient separation distances (of at least 21m) can be achieved between the proposed rear offshoots and the neighbouring dwellings to ensure that the proposed development will not give rise to unacceptable impacts on residential amenity by virtue of overlooking, loss of daylight / overshadowing, loss of outlook or overbearing impact.
- 5.15 The proposals will deliver a high quality, modern care home including comfortable en-suite bedrooms with lift access to all floors, along with internal and external communal

areas therefore ensuring that the scheme will deliver a high standard of living accommodation for future occupants.

- 5.16 The proposals will not therefore give rise to unacceptable impacts on residential amenity and would therefore accord with established policy objectives in this regard.

Highways Impact / Parking

- 5.17 Strategic Policy STR/1 - Sustainable Transport, Development and Accessibility sets out that the council aims to reduce reliance on private cars by locating development in areas that to minimise travel needs. The policy promotes infrastructure for walking, cycling, and public transport to encourage sustainable travel.
- 5.18 Policy STR/2 sets out that car parking provision should be in accordance with the Council's maximum standards, to reduce dependency on the car and to promote more sustainable forms of transport, and, in locations with good accessibility to facilities and services and served by high quality public transport, the Council will seek to reduce the amount of car parking provided, in line with the Conwy Parking Standards.
- 5.19 The planning application is accompanied by a Transport Statement prepared by Dice Consulting, which concludes as follows:
- The proposed development aligns with both local and national transport and land use planning policies.
 - The site is well-connected to local facilities and amenities, providing opportunities for staff and visitors to utilise non-car modes of transport.
 - An analysis of historical accident data indicates no significant accident trends that would be worsened by the increase in development traffic.
 - Vehicle and cycle parking provisions have been deemed adequate, based on previous parking demand and the availability of off-street parking.
 - An assessment of trip generation suggests that the development will likely result in approximately 7 two-way vehicle trips during the AM peak hour and 6 two-way

trips during the PM peak hour. This represents an increase of only 2 two-way trips in the AM peak and 1 two-way trip in the PM peak.

- 5.20 It is therefore concluded that that the proposed development is consistent with the existing policy framework and there are no highway-related reasons to withhold planning permission.

Ecology

- 5.21 Local Plan Policy NTE/3 states that new development should aim to conserve and, where possible, enhance biodiversity through sensitive layout and design and by integrating biodiversity measures into the built environment. The policy further requires that all proposals should include a Biodiversity Statement which details the extent of the impact on biodiversity.
- 5.22 This application is supported by a Preliminary Ecological Appraisal (PEA) prepared by Collington Winter and, subject to the implementation of the recommended mitigation measures and further survey work which can be secured by way of condition, the proposals will not give rise to adverse impacts on designated sites, habitats or protected species. Moreover, the application is accompanied by a Biodiversity Net Gain Assessment which demonstrates that an overall biodiversity net gain can be delivered across the site in line with established policy objectives. The application proposals are therefore considered to comply with Local Plan Policy NTE/3.

Trees

- 5.23 Paragraph 4.6.5.6 of the LDP states that the integration of development within the landscape should have regard to landscape elements, such as walls, trees or hedgerows which are important to landscape character and should be retained. This is echoed by national guidance in Paragraph 6.4.15 of the PPW which states that applicants must seek to minimise the initial impact on biodiversity and ecosystems by retaining existing features, such as trees and hedgerows and use appropriate buffers to protect these from construction and operational impacts.

5.24 The planning application is accompanied by an Arboricultural Survey, which identifies that there are very few quality trees within the site with all trees identified for removal being classified as Category C. The submitted Landscape Plan shows the potential for extensive new tree planting to offset the loss of the Category C trees and the Arboricultural Survey confirms that there are no arboricultural reasons for withholding planning permission.

Flood Risk / Drainage

5.25 The planning application is accompanied by a Foul & Surface Water Drainage Strategy prepared by ARP, which identifies that the site is at very low risk of flooding from rivers and sea and at low risk from other sources, including surface water, ground water, sewers and reservoirs.

5.26 In terms of surface water disposal, the strategy confirms that discharge to the ground or surface watercourses and the sea is not viable and, as such, surface water will discharge to the existing sewer network at a reduced discharge rate in comparison to the existing situation. In addition, foul water flows from the development will discharge into the existing public sewer in Kenelm Road.

5.27 On this basis, it is evident that the proposed development will not give rise to unacceptable impacts in relation to flood risk and drainage.

6. Conclusions

- 6.1 This Planning Statement has been prepared to accompany a full planning application for the demolition of existing buildings and erection of a replacement care home at the former Priory Grange Nursing Home, 13-17 Kenelm Road, Rhos-on-Sea.
- 6.2 The proposals will deliver a high quality residential care facility within a highly accessible location in the main urban area to meet the housing needs of an ageing population through the redevelopment of previously developed land in line with well-established policy objectives and therefore represent an entirely acceptable form of development in this location in principle. Moreover, the proposals represent a high quality and considered design response and would not give rise to unacceptable impacts in relation to highway safety, residential amenity, biodiversity, trees or flood risk.
- 6.3 We therefore respectfully request that the Council resolves to grant planning permission for this sustainable form of development, subject to any conditions that are deemed appropriate on this occasion.